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Attorneys for Defendant
YEVGENIY ALEXANDROVICH NIKULIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YEVGENIY ALEXANDROVICH NIKULIN,

Defendant.

Case No: CR 16-00440 WHA

DEFENDANT'S NOTICE OF EXPERT
TESTIMONY OF DIGITAL FORENSICS
EXPERT TAMI LOEHRS, EnCE, ACE,
CHFI, CCFE

Trial: March 9, 2020
Pretrial Conference: February 19, 2020
Time: 1:30 p.m.
Courtroom No. 12

Introduction

The Defense hereby provides notice of its likely intent to introduce expert testimony at trial in its case in chief from digital forensics expert Tami Loehrs, EnCE, ACE, CHFI, CCFE, under

1 FRE Rules 702, 703, and/or 705 of the Federal Rules of Evidence. This disclosure is made pursuant
 2 to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure.

3 This disclosure is in anticipation of the receipt of Ms. Loehrs opinion of the facts as it
 4 related to the law in this case. At this time, the defense is not yet in receipt of Ms. Loehrs opinion
 5 and should that opinion cause the defense to determine Ms. Loehrs will not testify, the defense will
 6 notify the government and withdraw Ms. Loehrs from the witness list. When the defense receives
 7 Ms. Loehrs opinion and it is determined that Ms. Loehrs has testimony relevant to the defense, the
 8 defense will forthwith provide that information to the court and the government and be prepared to
 9 address any issues under Rule 16(d)(2).
 10

11 **Qualifications and Experience**

12 Ms. Loehrs is a digital forensics expert and owner of Loehrs Forensics, LLC (formerly
 13 Loehrs & Associates), a firm specializing in digital forensics. Her offices are located at 1505 North
 14 Central Avenue, Suite 111, Phoenix, Arizona 85004.
 15

16 Ms. Loehrs has worked in the realm of computer technology for over 20 years and holds a
 17 Bachelor of Science degree in Information Systems. She has completed hundreds of hours of
 18 forensics training including courses with Guidance Software and Access Data. She is an EnCase
 19 Certified Examiner (EnCE), an Access Data Certified Examiner (ACE), a Certified Computer
 20 Forensic Examiner (CCFE), and a Certified Hacking Forensic Investigator (CHFI).
 21

22 Ms. Loehrs has conducted over one-thousand forensics exams on electronic evidence
 23 including hard drives, cell phones, removable storage media, security systems, dash cams, and
 24 other electronic devices, in addition to forensically preserving and analyzing on-line data such as
 25 cloud storage and social media platforms. She has conducted seminars on Computer Forensics and
 26 Electronic Discovery throughout the United States. In addition, she holds a Private Investigator
 27 Agency License in the State of Arizona which requires a minimum of 6,000 hours investigative
 28 experience.

1 DATED: January 15, 2020

/s/ Adam Gasner

Adam G. Gasner, Esq.

Attorney for Defendant

YEVGENIY ALEXANDROVICH NIKULIN

4 DATED: January 15, 2020

/s/ Valery Nechay

Valery Nechay, Esq.

Attorney for Defendant

YEVGENIY ALEXANDROVICH NIKULIN

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